

Appl. No. 10/037,707  
Amdt. Dated Jan. 7, 2004  
Reply to Office action of Oct. 14, 2003

REMARKS

Applicant thanks the Examiner for reminding him of the inclusion of references in the specification with an IDS. Accordingly, Applicant submits one IDS together with this amendment.

Claims 1-30 have been rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Pat. 6,580,283 to Carbone *et al.* In particular, the Examiner alleges, as represented by claim 1, that Carbone *et al.* disclose a docking system comprising a handler plate (probe plate 14), mountable to said device handler [not shown] and comprising at least one conversion bar (flange 40), each of said at least one conversion bar (40) comprising at least one lateral protrusion (cam follower arrangement 250 [fig. 20]); and a tester plate (chuck plate 12), mountable to said test head [not shown] and comprising at least one slot mount (cam plate 260), each of said at least one slot mount (260) having an escalating slot (groove 270), said escalating slot (270) being laterally oriented for respective linear engagement with said at least one lateral protrusion for said docking. This allegation is not supported by Carbone *et al.* Therefore, Applicant respectfully traverses the rejections for the following reasons.

“A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” *Verdegaal Bros. v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). “The identical invention must be shown in as complete detail as is contained in the

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...claim." *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). Here, the present invention represented by claim 1 claims a docking system for docking a test head of a device tester to a device handler, said docking system comprising: a handler plate, mountable to said device handler and comprising at least one conversion bar, each of said at least one conversion bar comprising at least one lateral protrusion; and a tester plate, mountable to said test head and comprising at least one slot mount, each of said at least one slot mount having an escalating slot, said escalating slot being laterally oriented for respective linear engagement with said at least one lateral protrusion for said docking. Simply put, during the docking process, the final tune of the closure between the handler plate and the tester plate is done by the engagement of the lateral protrusion on the conversion bar mountable to the handler plate with the escalating slot on the slot mount mountable to the tester plate. After careful review of the cited prior art, Applicant respectfully submits that Carbone *et al.* fails to disclosed the claimed invention.

Carbone *et al.* disclose a cartridge for wafer level burn-in and test, wherein the cartridge includes a chuck plate (12) for receiving a wafer and a probe plate (14) for establishing electrical contact with the wafer. The chuck plate and the probe plate are locked by a mechanical connecting device (90) which includes a male connector (94) and first and second opposed jaws (122, 124). *See, ABSTRACT.* It is apparent that the mechanical connecting device (90) for the locking of the chuck plate and the probe plate disclosed in Carbone *et al.* is quite different from the docking system (engagement of the lateral protrusion on the

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conversion bar with the escalating slot on the slot mount) for the closure of the handler plate and tester plate claimed in the present application.

As discussed above, the claimed invention as represented by claim 1 is quite different from the teachings disclosed by Carbone *et al.* While there are too many different features between these two closure mechanisms, Applicant wishes to point out one feature as an example showing how different they are. The Examiner alleges that a tester plate (chuck plate 12) comprises at least one slot mount (cam plate 260), each of said at least one slot mount (260) having an escalating slot (groove 270). The disclosure by Carbone *et al.* apparently fails to support such an allegation. For example, Carbone *et al.* teach that the cam plate (260) with the grooves is connected in the burn-in chamber to a pneumatic cylinder via the collar, wherein the pneumatic cylinder is in turn mounted to a vertical bar in the burn-in chamber via a connecting block. *See*, column 20, lines 32-36. There is no teaching that the cam plate (260) is included in the chuck plate (12). Therefore, Applicant respectfully submits that claim 1 is not anticipated by Carbone *et al.*

While the foregoing discussion has been focused on claim 1, the same arguments apply to the remaining claims (claims 2-30) because all the remaining claims are dependent ones upon claim 1 or the ones having narrower scopes than that of claim 1. Therefore, Applicant respectfully submits that claims 2-30 are not anticipated by Carbone *et al.*

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With respect to any potential issues of obviousness under 35 U.S.C. 103 in view of Carbone *et al.*, Applicant respectfully submits that Carbone *et al.* fail to suggest or teach a docking system by engaging a protrusion of the handler plate with an escalating slot of the tester plate. Therefore, Applicant respectfully submits that claims 1-30 are not obvious in view of Carbone *et al.*

In summary, the mechanical device for locking the chuck plate and the probe plate of the cartridge disclosed by Carbone *et al.* fails to anticipate or make obvious the docking system for closing the handler plate and the tester plate claimed by the present application. Therefore, Applicant respectfully request that the rejections to claims 1-30 be withdrawn.

Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

LAWRENCE N. GINSBERG,  
Attorney for Applicant, Reg. No. 30,943

1/13/04

DATE

21 San Antonio  
Newport Beach, CA 92660-9112  
Tel. - 949-640-6261